

Exhibit 36

15-0697 TGM/ae

Firm I.D. No: 90200

STATE OF ILLINOIS)
) §
COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

HARVEY KOHR, Individually, and as Executor/Trustee of
the Estate of HELENE KOHR, Deceased,

Plaintiff,

vs.

BRENNTAG NORTH AMERICA, INC., Individually, and as
Successor to MINERAL PIGMENT SOLUTIONS, INC., as
Successor to WHITTAKER, CLARK & DANIELS, INC.;
BRENNTAG SPECIALTIES, INC., Individually, and as
Successor to MINERAL PIGMENT SOLUTIONS, INC., as
Successor to WHITTAKER, CLARK & DANIELS, INC.;
**COLGATE-PALMOLIVE COMPANY; COTY, INC.; IMERYS
TALC AMERICA, INC.**, Individually, and as Successor to
RIO TINTO, a wholly owned subsidiary of LUZENAC
INC., and as Successor to CYPRUS AMAX MINERALS CO.
a/k/a CYPRUS MINES, WINDSOR MINERALS, INC.,
METROPOLITAN TALC CO., INC., CHARLES MATHIEU,
INC., and RESOURCES PROCESSORS, INC.; **CYPRUS
AMAX MINERALS CO.**, a/k/a CYPRUS MINES,
Individually, and as Successor to WINDSOR MINERALS,
INC., METROPOLITAN TALC CO., INC., CHARLES
MATHIEU, INC., and RESOURCES PROCESSORS, INC.;
**MCCRONE ASSOCIATES, INC.; THE MCCRONE GROUP,
INC.; PFIZER, INC.; R.J. REYNOLDS TOBACCO
COMPANY, and WHITTAKER CLARK & DANIELS, INC.**,

Defendants.

IN RE: ASBESTOS LITIGATION

NO: 2016L008842
CALENDAR/ROOM J1
TIME 00:00
Asbestos

2016 SEP -6 PM 3:51

PLAINTIFF'S COMPLAINT AT LAW

COUNT 1

NOW COMES the Plaintiff, HARVEY KOHR, Individually and as Executor/Trustee of the Estate of
HELENE KOHR, deceased, by and through his attorneys, COONEY & CONWAY and LEVY KONIGSBERG LLP,
and states as follows:

NATURE OF THE ACTION AND BACKGROUND

1. Plaintiff, HARVEY KOHR, Individually and as Executor/Trustee of the Estate of HELENE KOHR, deceased, brings this action due to defendants' tortious acts which proximately caused HELENE KOHR to be exposed to asbestos and to suffer and die from malignant mesothelioma.

2. HELENE KOHR was born on [REDACTED] 1934. She died a painful death from mesothelioma, an asbestos-caused cancer, at the age of 81 on January 18, 2016. She was survived by her husband of nearly 60 years, HARVEY KOHR, her three children, SHERYL SALZMAN, BETH KAIM, and ELISA KOHR, and her six grandchildren.

3. HELENE KOHR and her family lived in Chicago, Illinois up through approximately 1967 before moving to Skokie, Illinois for the remainder of her life. HARVEY KOHR continues to reside in Skokie, Illinois.

4. HELENE KOHR was, at various times, a stay-at-home mother and also held a job outside the home, including as an office manager for an adhesive tape company from 1974 until the early 1990s. Her work did not cause her to be exposed to asbestos. Her husband, HARVEY KOHR, worked in sales and, during certain years, was an office manager for certain law offices and a salesman for stereo/audio equipment. His work did not involve any asbestos exposure and therefore did not result in his wife being exposed to asbestos.

5. HELENE KOHR'S only exposures to asbestos came from two sources: (1) her smoking of Kent cigarettes with the asbestos-containing Micronite filter from approximately 1952 through 1956; and (2) her near lifelong use of cosmetic talc products that contained asbestos. These exposures to asbestos proximately caused HELENE KOHR to develop mesothelioma, a cancer solely caused by asbestos, and proximately caused pain and suffering, wrongful death and survival damages set forth in this Complaint.

been committed by the Talc Defendants in this Complaint.

7. Defendant MCCRONE's participation in the conspiracy with, and aiding and abetting of the tortious conduct of, the Talc Defendants was a proximate cause, or substantial factor, in causing HELENE KOHR'S the asbestos-related injuries of HELENE KOHR.

8. Each Talc Defendant is also jointly and severally liable for the conduct alleged herein under an aiding and abetting theory because each Talc Defendant provided substantial assistance and encouragement to the other Talc Defendants and McCrone in carrying out the tortious conduct alleged herein.

WHEREFORE, Plaintiff, HARVEY KOHR, Individually and as Executor/Trustee of the Estate of HELENE KOHR, deceased, demands judgment against the Defendants, in an amount in excess of jurisdictional amount, plus costs.

Respectfully submitted,

COONEY AND CONWAY

By: 
Attorneys for Plaintiff

Timothy G. Martin
COONEY AND CONWAY
Attorneys for Plaintiff
120 N. LaSalle Street, 30th Floor
Chicago, IL 60602
Firm I.D. No.: 90200
tmartin@cooneyconway.com

-and-

LEVY KONIGSBERG, LLP
Donald P. Blydenburgh, Esq. (NY Id. No. 4399432)
Jerome H. Block, Esq. (NY Id. No. 3997245)
800 Third Avenue, 11th Floor
New York, NY 10022
Telephone: (212) 605-6200